

**PLEASE TAKE NOTICE** that, upon the accompanying Plaintiffs' Motion to Overrule Defendants' Foreign Bank Secrecy and Scope/Burden Objections and Compel Defendants to Produce Documents Responsive to Plaintiffs' First Request for the Production Of Documents, the Declarations of Aaron Schlanger and Marshall Billingslea, both executed on May 2, 2022, together with the exhibits thereto, and all prior pleadings and proceedings had here, Plaintiffs, by and through their undersigned counsel, will move this Court, before the Honorable Taryn A. Merkl, in the United States Court House, 225 Cadman Plaza East, Brooklyn, New York 11201, on such date and at such time as the Court sets, for an Order pursuant to Fed. Rs. Civ. P. 26 and 34, to compel the production of the documents that Defendants have refused to produce based upon: (1) prohibitions imposed by Lebanese bank secrecy laws; and (2) scope, burden, and proportionality objections.

Dated: May 2, 2022

Respectfully submitted,

By: /s/ Gary M. Osen  
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